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Attorneys for Plaintiff  
REASSURE AMERICA LIFE  
INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

REASSURE AMERICA LIFE INSURANCE COMPANY	)	Case No.: CV 11-00488 MMC
	)	
Plaintiff.	)	<b>STIPULATION AND ORDER FOR</b>
	)	<b>JUDGMENT AND DISMISSAL</b>
v.	)	
	)	
ANDRIA D. R. BATISE, VERNA I. CHASE, ,	)	
MICKAELE CHASE, ALEXANDER CHASE	)	
and DOES 1-10, inclusive,	)	
	)	
Defendants.	)	

IT IS HEREBY STIPULATED, by and between plaintiff Reassure America Life Insurance Company ("Reassure"), and defendants Andria D.R. Batise, Verna I Chase, Mickaele Chase and Alexander Chase as follows:

1. That this Court may enter a stipulated judgment in interpleader in the form attached ~~hereto as Exhibit A~~, to the parties' stipulation filed May 12, 2011;
2. That, by reason of the death of Michael Chase ("decedent"), on July 25, 2010, the sum of One Hundred and Fifty Thousand Dollars (\$150,000.00)

1 (“Benefit proceeds”) became payable pursuant to Life Insurance Policy No.  
2 AUSE0019010 (the “Policy”) that was issued by Valley Forge Life Insurance  
3 Company to the decedent effective July 24, 2000; Reassure assumed Valley Forge  
4 Life Insurance Company’s business including the insured’s policy and currently  
5 administers the insured’s policy)

6 3. That defendants Andria D.R. Batise, Verna Iathe Chase, Mickaele Chase  
7 and Alexander Chase each claim entitlement to some or all of the Benefit Proceeds  
8 and that, to date, no other person or entity currently makes claim to Reassure for the  
9 Benefit Proceeds;

10 4. That Reassure was ready, willing, and able to deliver the Benefit  
11 Proceeds to the person(s) legally entitled thereto. However, by reason of the actual  
12 and potential competing claims to the Benefit Proceeds, Reassure did not know and  
13 was unable to determine the person(s) legally entitled to them;

14 5. That concurrently with the filing of its complaint in interpleader,  
15 Reassure deposited with the Clerk of this Court the Benefit Proceeds, totaling One  
16 Hundred Fifty Two Thousand, Three Hundred and Seventy Dollars and Fifty-  
17 FourCents (\$152,370.54), which represents the insurance proceeds payable under the  
18 Policy, plus interest;

19 6. That having deposited the monies with the Clerk of the Court on or  
20 about March 9, 2006, Reassure, its predecessors, successors, affiliates, parent  
21 corporation, officers and agents are fully and forever released, discharged, and  
22 acquitted from any liability of any kind or nature whatsoever under the Policy or by  
23 reason of the death of the decedent as to any and all claims, charges, demands, or  
24 otherwise that exist now or may arise at any time in the future;

25 7. That Reassure is entitled to fees of \$ 13,754.00 and costs of 544.25, for a  
26 total of \$ 14,298.25, to be paid out of the Benefit Proceeds deposited with the Clerk  
27 of this Court;

1           8.     That defendants stipulate that the remaining Benefit Proceeds deposited  
2 with the Clerk of the court will be divided among the parties and paid out as follows:

3               a.     Andria D.R. Batise will receive \$10,000.00 payable by check or  
4 draft to Andria D.R. Batise;

5               b.     Verna Ianthe Chase will receive \$42,648.07 from the balance,  
6 payable by check or draft to Verna Ianthe Chase, P.O. Box 4744, Stockton, CA  
7 95204;

8               c.     Michaele Chase will receive \$42,648.07 from the balance, payable  
9 by check or draft to Douglas A. Haydel, trustee for Mickaele Chase;

10              d.     Alexander Chase will receive \$42,648.07 from the balance,  
11 payable by check or draft to Douglas A. Haydel, trustee for Alexander Chase.

12              e.     Any remaining balance, resulting from the accrual of interest from  
13 the deposit of Benefit Proceeds with the Court, shall be divided equally (33 1/3 %)  
14 between Verna Iathe Chase, Michaele Chase and Alexander Chase, and added to their  
15 respective shares as referenced above.

16           9.     That defendants Andria D.R. Batise, Verna I. Chase, Mickaele Chase  
17 and Alexander Chase are permanently enjoined from instituting or prosecuting any  
18 proceeding in any state or United States court against Reassure, its predecessors,  
19 successors, affiliates, parent corporation, officers and agents with respect to the  
20 proceed due under the Policy; and

21           10.    That Reassure is dismissed from this action with prejudice and the entrie  
22 action is dismissed.

23  
24 Date: May 11, 2011

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

25  
26 By: 

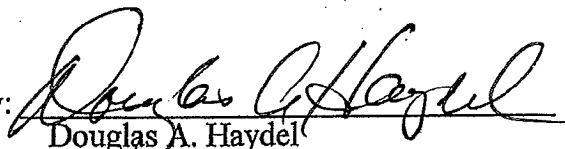
27 THOMAS M. HERLIHY  
LISA S. PASSALACQUA  
28 Attorneys for Plaintiffs

REASSURE AMERICA LIFE  
INSURANCE COMPANY

Date: 5/10/11

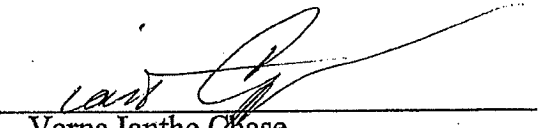
HAYDEL & ORNELLAS

By:

  
Douglas A. Haydel  
Attorney for Defendants  
Andria D.R. Batise, Mickaele Chase  
and Alexander Chase

Date: 5/10/11

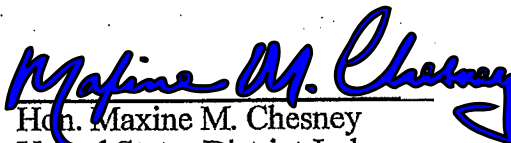
By:

  
Verna Ianthe Chase  
Defendant

**ORDER**

**IT IS SO ORDERED.**

Dated: May 13, 2011

  
Hon. Maxine M. Chesney  
United States District Judge